

REMARKS

I. Introduction

In response to the Office Action dated October 6, 2004, claims 10, 20, and 30 have been cancelled, claims 1, 8, 11, 18, 21, 28, 31, 33, and 35 have been amended, and claims 37-39 have been added. Claims 1-9, 11-19, 21-29, and 31-39 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Prior Art Rejections

On page (2) of the Office Action, claims 1, 4-5, 11, 14-15, 21, and 24-25 were rejected under 35 U.S.C. §102(e) as being anticipated by Schreiber et al., U.S. Patent No. 6,298,446 (Schreiber). On page (6) of the Office Action, claims 2, 6-10, 12, 16-20, 22, and 26-36 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schreiber. On page (12) of the Office Action, claims 3, 13, and 23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schreiber in view of Sonderegger, U.S. Patent No. 5,893,118 (Sonderegger).

Specifically, independent claims 1, 11, and 21 were rejected as follows:

In regard to independent claim 1 (and similarly independent Claims 11, and 21), Schreiber teaches displaying an image to a user in a web page (a web page here contains an instance of the object, an image in this case that is modified) without downloading unmodified image data to the user's computer (Col. 3, lines 10-14). In place of the original image, substitute data, such as encrypted image data, is sent to the browser when the original image is protected (the original image remains on the server, while the altered instance goes to the client). Compare with Claim 1 (and similarly Claims 11 and 21), "... (a) storing the object data for the object separate from a file containing an instance of the object". Schreiber also teaches that at step 202 (see Fig. 2), the client computer requests a connection to the server computer (compare with (b) obtaining a request to load the file) (Col. 11, lines 18-19). At step 210 the web server receives the HTTP request for the web page from the client computer. At step 212 the server computer searches a database to determine whether or not the web page being requested references any protected images, or has protection tags ((c) determining if the object data is available). If so (object data not available), it routes the incoming HTTP request to an HTTP request filter (see Fig. 1). The HTTP filter applies a web page parser to the requested web page parser to the requested web page and identifies the images referenced there within. At step 214 the server computer generates a modified web page wherein references to the protected images are replaced with references to substitute data. The substitute data is preferably derived from the protected images (Col. 11, lines 25-38). The modified web page is preferably a separate web page generated by a web page modifier, so that the original web page is preserved, as indicated in Fig. 1. Alternatively, the substitute references may be incorporated directly into the original web page, without generation of a separate modified web page. At step 216 the modified web page is sent back to the client computer within an HTTP response. At step 218 the client computer receives the modified web page containing references to substitute data, and the web browser begins to render the modified web page. In rendering the modified web page, the web browser encounters the references to the substitute data, and at step 220 the substitute data processor within the client computer issues to the web server an HTTP request for the substitute data. At step 222 the server computer receives

the HTTP request for the substitute data, and at step 224 the server sends an HTTP response containing the substitute data to the client computer. At step 226 the client computer receives the HTTP response containing the requested substitute data, and at step 228 the client computer processes the substitute data using a substitute data processor, as described hereinabove with respect to Fig. 1, and renders the web page (Col. 11, lines 42-64). If the server computer determines at step 212 that the requested web page does not reference protected images and does not have protection tags, then the HTTP request is passed to the server without any parsing *((d) if the object data is available)*. In this case, the processing is much simpler, and proceeds in the normal manner. Specifically, a modified web page is not generated and substitute data is not used. Rather, at step 232 the unmodified web page is sent to the client computer within an HTTP response. At step 234 the client computer receives the HTTP response containing the unmodified web page, and the web browser begins to render the web page. In rendering the web page, the web browser encounters the references to unprotected images, and at step 236 the client computer issues an HTTP request for the unprotected images to the web server *(obtaining the object data)*. At step 238 the server computer receives the HTTP request for the unprotected images, and, in response, at step 240 the server computer sends an HTTP response containing the unprotected images. At step 242 the client computer receives the HTTP response with the unprotected image data, and at step 244 the web browser processes the unprotected images and renders them with the web page (Col. 12, lines 3-23; compare with Claim 1 (and similarly Claims 11, and 21), "...utilizing the object data to display a graphical representation of the object").

Applicant traverses the above rejections for one or more of the following reasons:

- (1) Neither Schreiber nor Sonderegger teach, disclose or suggest a lightweight representation of an object that is stored separately from a file containing an instance of the object;
- (2) Neither Schreiber nor Sonderegger teach, disclose or suggest a file that is a drawing, an object that is a drawing component, and object data that comprises a drawing component property; and
- (3) Neither Schreiber nor Sonderegger teach, disclose or suggest utilizing object data to resurrect an object graphically in a drawing.

Independent claims 1, 11, and 21 are generally directed to the use and storage of objects. Specifically, the amended claims provide that a lightweight representation of an object is stored as object data separately from the location (i.e., the file) where an instance of the object is stored. In addition, the amended claims now provide that the file is a drawing, the object comprises a drawing component and the object data comprises a drawing component property. The file containing the instance of the object is loaded. Upon loading, the invention determines if the object data (that is stored separately) is available. If the object data is available, the object data is obtained (i.e., from the separate location). Further, the obtained object data is used to resurrect the object graphically in the drawing.

Thus, rather than storing all of the graphical data for the drawing remotely, only a lightweight representation of the object is stored separately from the instance itself. Further, this lightweight representation is then used to resurrect the object graphically in the drawing. In addition, the independent claims now include the limitation that the object data refers to drawing component properties for a drawing component in the file (which is a drawing).

The cited references do not teach nor suggest these various elements of Applicant's independent claims.

Schreiber merely describes a method for protecting digital images distributed over a network, including the steps of receiving a request from a client computer running a network browser, for an original layout page containing references to digital images therein, parsing the original layout page for the references to digital images, generating a modified layout page from the original layout page by replacing at least one of the references to digital images in the original layout page with references to substitute data, and sending the modified layout page to the client computer. (See Abstract).

As set forth above (and throughout Schreiber), Schreiber merely describes storing an image on a web page separately from the HTML defining the web page (see col. 3, line 1 - col. 5, line 4). The purpose of Schreiber is to prevent a user from copying a protected image (see col. 3, lines 15-17). The rejection provides that Schreiber's original image data remains on the server and the altered instance goes to the client. Accordingly, Schreiber's original image data is the primary and large piece of information and is stored on the server. In this regard, the Office Action asserts that the HTML file containing the instance of the object is stored at the client and the full image file is stored remotely on the server. However, such assertions are now contrary to that set forth in the amended claims. Namely, as claimed, the file containing the instance of the object does not contain the lightweight representation of the object. Instead, the lightweight representation of the object (i.e., the small and easily transportable data) is stored separately from the file containing the instance. In other words, the file containing the instance of the object contains significant information while the lightweight information needed to resurrect and display the data is stored separately. Thus, in opposition to that asserted in the Office Action and Schreiber, the current claims provide a different approach. Again, Schreiber specifically provides for storing the image data at a remote location and merely a reference to that data in the HTML file. Such a teaching is contrary to that currently set forth in the claims.

In addition to the above, the amended claims provide that the file is a drawing, the object is a drawing component, and the object data comprises a drawing component property. Some of these limitations existed in prior claims 10, 20, and 30. In rejecting claims 10, 20, and 30, the Office Action admitted "Schreiber does not explicitly teach that the file is a drawing". However, the Office Action stated that it would have been obvious that the file containing the instance of the image could be that of a drawing. Further, the Office Action asserted that the modified version of the real image was an object and is equivalent to the limitation "the object is a drawing component" (col. 3, lines 26-30). Applicant notes that col. 3, lines 26-30 provide:

In a preferred embodiment, the present invention uses a software web server plug-in that filters HTTP requests and sends substitute data, such as encrypted image data, for requested image data that is protected.

Applicant submits that merely having an image on a web page is not equivalent to a drawing whatsoever. To provide further support for such an assertion, new dependent claims 37-39 provide that the drawing is a computer aided design (CAD) drawing. Such a drawing is easily and clearly differentiable from a raster image such as a JPEG or TIFF image displayed on a web page.

Further, Schreiber provides that digital images are viewed over the Internet within web pages and that typically, the data for the graphic objects, such as images are displayed within the web page (see col. 6, lines 26-41). In this regard, rather than Schreiber's file being a drawing, Schreiber's file is an HTML or XML page that may contain various images. Such a teaching cannot and does not teach, disclose, or suggest, the present invention. Applicant asserts that Schreiber's web page (i.e., HTML or XML file) may contain many images but is not a drawing itself. In fact, it would be impossible for a web page that references images to be a drawing itself because an image file would not contain any references to other images (in Schreiber or otherwise).

In addition, Applicant traverses the asserted equivalency between the claimed object (within the file) being a drawing component (i.e., a component of the drawing file) and a mere reference to a real image. In this regard, based on Schreiber, the image is a file itself and is not a component of a drawing. There is a distinct difference between such components. Such a drawing component may be a part offered by a supplier (e.g., as set forth in claim 8). Thus, a drawing component is an object within a drawing and is not the entire image or drawing or a web page as asserted in the Office Action.

Further, the claims provide that the object data comprises a drawing component property. A property of the drawing component is not set forth anywhere in Schreiber as set forth in the claims and supported in the specification.

In addition to the above, Applicant notes that the lightweight representation of the object is now used to resurrect the object/drawing component graphically in the drawing. Thus, rather than merely displaying an image, the drawing component is resurrected graphically into the drawing. Such a limitation is not taught, disclosed or alluded to in Schreiber or the other cited references.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Schreiber and Sonderegger. In addition, Applicant's invention solves problems not recognized by Schreiber and Sonderegger.

Thus, Applicant submits that independent claims 1, 11, and 21 are allowable over Schreiber and Sonderegger. Further, dependent claims 2-9, 12-19, 22-29, and 31-39 are submitted to be allowable over Schreiber and Sonderegger in the same manner, because they are dependent on independent claims 1, 11, and 21, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-9, 12-19, 22-29, and 31-39 recite additional novel elements not shown by Schreiber and Sonderegger.

III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: January 6, 2005

By: 

Name: Jason S. Feldmar

Reg. No.: 39,187

JSF/amb